



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

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EPA Region 5 Records Ctr.



200299

REPLY TO THE ATTENTION OF:

SR-6J

September 18, 1997

Dean Pisani  
ENTACT, Inc.  
1360 North Wood Dale Road  
Suite A  
Wood Dale, IL 60191

RE: Engineering Evaluation/Cost Analysis Workplan

Dear Mr. Pisani:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the Engineering Evaluation/Cost Analysis (EE/CA) Workplan submitted by ENTACT, Inc. The Agency review and subsequent comments will not necessitate a revision to the Workplan and pursuant to the Administrative Order on Consent, the EE/CA Support Sampling Plan is due 15 calendar days after receipt of these comments. The Ohio Environmental Protection Agency (Ohio EPA) comments on the EE/CA Workplan are also enclosed.

The following is the Agency comments on the Workplan:

- General Comment: The main purpose of the EE/CA is to determine if additional remediation will be required after the removal action. In the development of the EE/CA Support Sampling Plan, please keep the above in mind when developing this document. Some areas on-site have been characterized, but the Workplan questions the validity of some of the data. Therefore, these areas along with locations that have not been sampled previously on-site will require sampling.
- Page 4: The statement that lead is the constituent of concern is correct, but that should not exclude other heavy metals in the upcoming sampling event. Other heavy metals associated with this secondary lead smelter may be at levels which produce an unacceptable risk.
- Page 5: The Drum Container Storage Area and Battery Storage Area will require additional sampling both at surface and depth to determine what levels and what constituents are present. A suggestion would be to submit to the Agency a detailed site map with the sampling locations prior to submittal of the EE/CA Support Sampling Plan.

- Page 5: The Agency disagrees with your assumption that off-site surface/subsurface investigation is not required. The site has had a history of non-compliance with National Ambient Air Quality Standards for Lead which justifies off-site sampling. The facility and adjacent areas are located on slag fill therefore, sampling to depths in which slag is encountered is not required. Areas adjacent to and within the roundhouse rail yard contain open areas that may have been affected by emissions from Master Metals and the off-site investigation should focus on those areas. In addition, areas west of the site between the baseball field/residential area and the playground will require sampling to verify that site contaminants have not affected those areas.
- Page 5 and Page 6: The Agency is in agreement with ENTACT regarding the future use of groundwater. Sampling of the existing wells will be required to ensure that groundwater affected by the Master Metals operation is not discharging to the Cuyohaga River. The sampling should include all heavy metals.

If you have any questions or concerns on the comments, feel free to contact me at (312) 886-7278.

Sincerely,



Thomas Alcamo  
Chemical Engineer

cc: Joe Trocchio, OEPA-NEDO  
Jay Young, NL Industries  
Ababi Harris, SR-6J